

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

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DR. ROBERT LEDERER,  
Plaintiff,

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v.

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CIVIL ACTION NO.  
04-10284-NG

JOHN SNOW, INC. and  
THE JOHN HOPKINS UNIVERSITY/  
CENTER FOR COMMUNICATION  
PROGRAM,  
Defendants.

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**THE JOHNS HOPKINS UNIVERSITY/CENTER FOR COMMUNICATION  
PROGRAM'S ASSENTED TO MOTION TO EXTEND DISCOVERY THIRTY DAYS**

Now comes Johns Hopkins University/Center for Communication Program ("JHU") and request that the Court extend discovery thirty days to allow the parties to complete the remaining discovery.

The parties have scheduled depositions for the week of April 18, 2005 in order to accommodate all counsel and the plaintiff's travel schedule to allow his deposition to be completed and to allow the plaintiff's participation in the defendants' depositions. However, counsel for JHU now has a commitment out of the state that week that necessitates the request for an additional thirty days to complete those depositions.

WHEREFORE, the parties respectfully request that this Honorable Court allow the motion.

**Johns Hopkins University/  
Center for Communication Programs,  
By their attorney,**

/s/ John F. Rooney, III

John F. Rooney, III, BBO# 426895

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**The Plaintiff,  
By his attorney**

/s/ David B. Stein

David B. Stein, BBO# 556456

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KAJKO & STEIN, LLP

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**John Snow, Inc.**

**By their attorney,**

/s/ Andrew F. Caplan

Andrew F. Caplan, BBO # 564127

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Dated: April 13, 2004

I hereby certify that I have made service  
of the foregoing document in accordance  
with the procedures of Fed. R. Civ. P. 5.